

The Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

C.P., by and through his parents, Patricia
Pritchard and Nolle Pritchard, individually and
on behalf of others similarly situated; and
PATRICIA PRITCHARD,

Plaintiffs,

v.

BLUE CROSS BLUE SHIELD OF
ILLINOIS,

Defendant.

NO. 3:20-cv-06145-RJB

DECLARATION OF ELEANOR
HAMBURGER IN SUPPORT OF
PLAINTIFFS' REPLY IN SUPPORT OF
PLAINTIFFS' CONSOLIDATED MOTION
TO EXCLUDE EXPERT TESTIMONY

**Note on Motion Calendar:
November 18, 2022**

I, Eleanor Hamburger, declare under penalty of perjury and in accordance with the laws
of the State of Washington and the United States that:

1. I am a partner at Sirianni Youtz Spoonemore Hamburger and am one of the
attorneys for Plaintiffs in this action.

2. Attached are true and correct copies of the following documents, with underlining
where appropriate for the Court's convenience:

Exhibit	Description	Date
1.	Email from Stephanie Bedard disclosing Dr. Michael Laidlaw's Bibliography	09/07/2022

DECL. OF ELEANOR HAMBURGER IN SUPPORT OF
PLAINTIFFS' REPLY IN SUPPORT OF PLAINTIFFS'
CONSOLIDATED MOT. TO EXCLUDE EXPERT TESTIMONY – 1
[Case No. 3:20-cv-06145-RJB]

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Exhibit	Description	Date
2.	Excerpts of the transcript of the deposition of Michael Laidlaw, M.D., taken in this matter	09/02/2022
3.	APA Resolution on Gender Identity Change Efforts, adopted by the American Psychological Association in February 2021, a copy of which was entered as Exhibit 10 to the deposition of Michael Laidlaw, M.D., taken in this matter on September 2, 2022	02/2021
4.	Position Statement on Transgender Health of the Endocrine Society and Pediatric Endocrine Society	12/2020
5.	Position Statement on Access to Care for Transgender and Gender Diverse Individuals of the American Psychiatric Association	07/2018

DATED this 18th day of November, 2022, at Seattle, Washington.

/s/ Eleanor Hamburger

Eleanor Hamburger (WSBA #26478)
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